



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

January 11, 2017

Derek J. Robinson, BRAC Environmental Coordinator  
Department of the Navy  
Base Realignment and Closure Program Management Office West  
33000 Nixie Way, Building 50  
San Diego, CA 92147

Re: EPA Comments on the Response to Comments on the Draft Final Remedial Action Completion Report for the Durable Covers Remedy in Parcel B-1, Hunters Point Naval Shipyard, San Francisco, California, December 2016

Dear Mr. Robinson:

Attached are EPA's comments on the Response to Comments on the Draft Final Remedial Action Completion Report for the Durable Covers Remedy in Parcel B-1, Hunters Point Naval Shipyard, San Francisco, California dated December 2016 (RACR).

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at [huang.judy@epa.gov](mailto:huang.judy@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Judy C. Huang".

Judy C. Huang, P.E.  
Remedial Project Manager

cc:

Nina Bacey, DTSC  
Tina Low, RWQCB  
Amy Brownell, SFDPH

**USEPA Review of the Responses to Comments on the Draft Remedial Completion Report  
for Parcel B-1 and the Redline Draft Final Remedial Completion Report for the  
Durable Covers Remedy in Parcel B-1, Hunters Point Naval Shipyard, San Francisco,  
California, December 2016**

**EVALUATION OF RESPONSES TO COMMENTS**

**Evaluation of the Response to General Comment 1:** The response is inconsistent with the main text. The response states that “The RACR has been revised to document completion of the durable covers remedy. Completion of the groundwater and soil vapor remedies is ongoing and will be documented in a separate RACR in the future.” However, Executive Summary, Page ES-1, Second Paragraph, states that “This RACR also documents the implementation of institutional controls (ICs) for soil gas and groundwater contamination in Parcel B-1, excluding a portion of Installation Restoration (IR) site 10 (IR-10), located within parcel B-1.” Based on past Base Cleanup Team (BCT) discussions, it is EPA’s understanding that the intent of this RACR is to address the durable covers component of the remedy for the entire Parcel B-1 and the groundwater and soil gas components of the remedy for the majority of parcel B-1, with the exception of a portion of IR-10. It is only this portion of IR-10 that will be addressed by a later soil gas and groundwater RACR. Please revise the Responses to Comments.

**ADDITIONAL GENERAL COMMENT**

As discussed in prior Base Cleanup Team meetings, EPA is in the process of requesting the Navy to update the Volatile Organic Compound Area Required Institutional Controls (VOC ARICs) at Hunters Point due to the issuance of the final *OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air* in June 2015. This is an update from the 2002 draft guidance the Navy used to determine the Soil Gas Action Levels in 2011. EPA will be requesting the Navy to add additional grid squares as VOC ARICs in Parcel B. Please be advised that 1) the RACR will need to be revised, or 2) an addendum to the RACR will need to be prepared to address these additional VOC ARICs grid squares.